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5 *Attorneys for Defendant*

6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE DISTRICT OF ALASKA

8 WATTERSON CONSTRUCTION CO.,

9 Plaintiff,

10 vs.

11 INTERNATIONAL DOOR, INC.,

12 Defendant.

Alaska Superior Court Case No.:  
3AN-21-04368CI

Case No. 3:21-cv-\_\_\_\_\_

13 **NOTICE OF REMOVAL OF CIVIL ACTION**

14 Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant International Door, Inc.  
15 (“International Door”) hereby removes this case to the United States District Court for the District  
16 of Alaska on the grounds set forth below:

17 1. On or about February 2 2021, Plaintiff Watterson Construction Co. (“Watterson”)  
18 filed an action against International Door in the Superior Court for the State of Alaska, Third  
19 Judicial District at Anchorage, titled *Watterson Construction Co., v. International Door, Inc.*, Case  
20 No. 3AN-21-04368CI (the “State Action”).

21 **TIMELY REMOVAL**

2. International Door first received the initial pleadings setting forth the claims for  
relief on which the State Action is based on February 9, 2021. This Notice of Removal of Civil

1 Action is filed within thirty days after receipt by International Door of copies of the Summons and  
2 Complaint in the State Action on February 9, 2021, and is timely under 28 U.S.C. § 1446(b).

3 **DIVERSITY JURISDICTION**

4 3. This Court has original jurisdiction over the claims set forth in the Complaint  
5 pursuant to 28 U.S.C. § 1332(a), on the basis of diversity jurisdiction. Diversity jurisdiction exists  
6 where the matter in controversy is between citizens of different states and exceeds the sum or value  
7 of \$75,000, exclusive of interest and costs. 28 U.S.C. § 1332.

8 4. On information and belief, Watterson is a construction company incorporated in  
9 Alaska, whose principal place of business is located in Anchorage, Alaska. Compl. ¶ 1.

10 5. Defendant International Door is a door supplier incorporated in the State of  
11 Michigan, with its principal place of business in Canton, Michigan. It is a citizen of Michigan,  
12 and therefore is not a citizen of the same state as Watterson. Compl. ¶ 2.

13 6. The amount in controversy exceeds \$75,000. Watterson prays in its Complaint for  
14 compensatory damages against International Door in excess of \$860,566.96, plus enhanced  
15 damages under the Alaska Unfair Trade Practices and Consumer Protection Act. Compl., Prayer  
16 for Relief ¶¶ 1-2.

17 7. Accordingly, the Complaint satisfies the diversity and amount in controversy  
18 requirements of 28 U.S.C. §§ 1332(a) and 1441(b)(2). The State Action is, therefore, a civil action  
19 over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332 and is one that may  
20 be removed to this Court pursuant to the provisions of 28 U.S.C. §§ 1441 and 1446.

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**VENUE**

9. Venue is proper in this district pursuant to District of Alaska Local Rule 3.3(b).

**NOTICE**

10. Attached as **Exhibit A** is a copy of the notice to the state court of the removal, which will be filed promptly in the Superior Court for the State of Alaska, Third Judicial District at Anchorage.

11. Copies of all process, pleadings, and orders received or obtained by International Door are attached as Exhibits according to 28 U.S.C. § 1446(a):

<u>Exhibit ID</u>	<u>Document Name</u>	<u>Date Filed</u>
<b>Exhibit B</b>	Complaint	02-02-2021
<b>Exhibit C</b>	Summons and Notice	02-02-2021
<b>Exhibit D</b>	Entry of Appearance	02-02-2021

WHEREFORE, International Door, Inc. has removed the state action to this Court.

DATED this 1st day of March, 2021.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for Defendant International Door,  
Inc.

By: /s/ Anne Marie Tavella  
Anne Marie Tavella, ABA #1506045

Certificate of Service

On the 1st day of March 2021, a true and correct copy of the foregoing document was sent to the following parties via Email and U.S. Mail, postage paid:

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Douglas A. Karet  
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By: /s/ Kris Hamann

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